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Christiana LLC, and Alexander LLC

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re

15005 NW Cornell LLC; and  
Vahan M. Dinihanian, Jr.,

Debtors.

Bankruptcy Case Nos.:

19-31883-dwh11 (Lead Case)

19-31886-dwh11

Jointly Administered Under  
Case No. 19-31883-dwh11

LOGAN PARTIES' PRECAUTIONARY  
OBJECTION TO FINAL APPLICATION  
FOR PROFESSIONAL  
COMPENSATION OF PERKINS COIE  
LLP

Interested parties and creditors Lillian Logan, Cornell Rd LLC, Christiana LLC and Alexander LLC (collectively the "Logan Parties") by and through their attorneys Jordan Ramis PC, hereby object to the Final Applications for Compensation of Perkins Coie LLP filed in the jointly administered bankruptcy cases as [Dkt. 131]. This objection is supported by the court record and specifically the Application to Employ Matthew Arbaugh (Arbaugh Law) as

independent counsel for the Debtors.<sup>1</sup> Arbaugh Law was employed to assist in “resolution of outstanding administrative expenses for the fees and costs owed to [Motschenbacher & Blattner LLP] and Perkins Coie LLP.” *Application to Employ Special Counsel*, pgs. 2-3 [Dkt. 655].

In its Application for Final Professional Compensation [Dkt. 131] on page 2 of Exhibit 1, Perkins Coie LLP states “Perkins Coie has agreed to a discounted aggregate amount of total fees and expenses totaling \$421,732.96.”

### PRECAUTIONARY OBJECTION

Because Motschenbacher & Blattner LLP, counsel for Vahan Dinihanian, Jr. has taken the position that it is seeking the full amount of fees in its application, notwithstanding the Debtors’ compromise with their counsel, this objection is made solely to confirm that Perkins Coie LLP is not seeking the same treatment.

So long as Perkins Coie LLP’s fees and costs are limited to the discounted amount stated in paragraph 8 of Exhibit 1 in its application, the Logan Parties have no objection. The Logan Parties reserve the right to object on additional grounds should Perkins Coie LLP change its stated position.

DATED this 24<sup>th</sup> day of February, 2023.

JORDAN RAMIS PC

By: /s/ Daniel L. Steinberg

Russell D. Garrett, OSB #882111

Daniel L. Steinberg, OSB #993690

Attorneys for Lillian Logan, Cornell Rd LLC,  
Christiana LLC, and Alexander LLC (the Logan  
Parties”)

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<sup>1</sup> This case 19-31886 is administratively consolidated with the bankruptcy case of 15005 NW Cornell LLC Case No. 19-31883.

**CERTIFICATE OF SERVICE**

I hereby certify that on the date shown below, I electronically filed the foregoing **LOGAN PARTIES' PRECAUTIONARY OBJECTION TO FINAL APPLICATION FOR COMPENSATION OF PERKINS COIE LLP** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED: February 24, 2023.

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